

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC., et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Civil Action No. _____

**PLAINTIFFS' MOTION FOR LEAVE TO PROCEED UNDER PSEUDONYMS, TO
WAIVE REQUIREMENT UNDER LOCAL RULE 102.2(a) TO PROVIDE ADDRESSES
IN COMPLAINT CAPTION, AND FOR A PROTECTIVE ORDER**

Plaintiffs Gabe and George Goe (“the Goe family”); Bella and Bruce Boe (the “Boe family”); Cameron and Claire Coe (the “Coe family”); Robert and Rachel Roe (the “Roe family”); Dylan Doe; and Lawrence Loe, by and through their undersigned counsel, pursuant to Federal Rules of Civil Procedure 5.2 and 26(c), respectfully move this Court for an order granting them leave to proceed under pseudonyms, waiving the requirement under Local Rule 102.2(a) to provide their addresses in the caption of the Complaint, and for a protective order limiting disclosure of their identities to counsel for Defendants. Plaintiffs B.G. a/k/a W.G. and Kristen Chapman join in the request to waive the requirement under Local Rule 102.2(a) that they provide their addresses in the caption of the Complaint. The grounds for this motion are set forth in the attached memorandum of law.

WHEREFORE, Plaintiffs request that their Motion for leave to proceed under pseudonyms be granted, that the requirement under Local Rule 102.2(a) to provide their addresses in the caption of the Complaint be waived, and the Court issue a protective order limiting disclosure of their identities to counsel for Defendants.

Date: February 4, 2025

Respectfully submitted,

/s/ Zachary B. Cohen

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**Application for admission or admission pro hac vice forthcoming.*

*** Application for admission pro hac vice forthcoming and admitted only in D.C. Supervised by principals of the firm admitted in Massachusetts.*

CERTIFICATE OF SERVICE

I hereby certify that this motion, the attached memorandum of law, and proposed order will be served concurrently with the service of the Summonses and Complaint in this matter upon the following defendants by certified mail, return receipt requested:

DONALD J. TRUMP, in his official capacity as President of the United States,
1600 Pennsylvania Ave. NW
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U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES,
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